

September 3, 2020

Mr. William Swahl
Vice President, Operations
Exelon Generation Co. LLC
#1 Industrial Highway
Eddystone, PA 19022

Re: Comments on Draft NPDES Permit
Eddystone Generating Station
Permit No. PA0013714
Authorization ID No. 1270579
Eddystone Borough, Delaware County

Dear Mr. Swahl:

We have reviewed your comments submitted in the below email on the draft NPDES permit for the above referenced facility and offering the following responses:

1. Draft NPDES Permit Page 1

The mailing address will be revised as requested in the final permit documents.

2. Draft NPDES Permit Pages 6 and 7, Part A Section I.E – Outfall 008

In the absence of proper mixing study, the following are our guidelines:

- (i) Use Delaware River flow at Trenton Calhoun Street Bridge for discharges to Delaware estuary to determine the available dilution, which is equal to 2, 500 cfs
- (ii) Use 1% of the above flow as an available dilution for discharges to the Delaware Estuary which is equal to 25 cfs = 16.18 mgd.

The discharge flow at Outfall 008 is 835.2 mgd and the flow available for dilution is 16.18 mgd. Therefore, obviously no dilution is available. Without the dilution, the criterion becomes WQBEL. See the below table:

Parameter	Max. Concentration In the application (ug/l)	Most Stringent Criterion (ug/l)	WQBEL
Total Copper	7	9.3	9.3
Total Lead	2	3.2	3.2

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Discharge concentrations of Copper and Lead are more than 50% of the WQBEL. According to our SOP, if the discharge concentration is more than 50% of the WQBEL, the effluent limit should be included. Since we don't have sufficient data to establish a limit, monitoring requirement is included to collect more data. The reasonable potential will be evaluated based on the data at the next renewal and the monitoring requirement may be changed based on the evaluation.

Modeling for the thermal plume doesn't provide the information required to evaluate the reasonable potential for toxic parameters. The monitoring requirement for Total Copper and Total Lead will stay in the permit for the next permit term.

3. Draft NPDES Permit Page 18, Part A Section III.B.5

A new column titled "Capacity Utilization Rate" will be added into the Supplemental Report-Cooling Water Intake Monitoring form. Permittee is required to report the parameters applicable to the facility.

4. Draft NPDES Permit Page 38, Part C Section V.E., Page 39, Part C Section V.H., and Page 39, Part C Section V.I.

Please see the attached revised Cooling Water Intake Structures Condition incorporating the requested changes. This revised condition will be included in the final permit.

If you have any questions, please contact me at saabraham@pa.gov or 484.250.5195.

Sincerely,

Sara Abraham

Sara Reji Abraham, E.I.T.
Project Manager
Clean Water Program